

**FILED****JUL 22 2014**CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

## UNITED STATES DISTRICT COURT

for the

Southern District of Illinois

Trumel Douglas FreemanCase Number: 14-831-JPG

(Clerk's Office will provide)

Plaintiff/Petitioner(s)

v.

Madison County Jail☒ CIVIL RIGHTS COMPLAINT

pursuant to 42 U.S.C. §1983 (State Prisoner)

☐ CIVIL RIGHTS COMPLAINT

pursuant to 28 U.S.C. §1331 (Federal Prisoner)

☒ CIVIL COMPLAINTpursuant to the Federal Tort Claims Act,  
28 U.S.C. §§1346, 2671-2680, or other law

Defendant/Respondent(s)

**I. JURISDICTION****Plaintiff:**

- A. Plaintiff's mailing address, register number, and present place of confinement.

6172 Laura Ave. ST. Louis MO. 63136  
ID# 42718405 Randle St.Edwardsville IL 62025**Defendant #1:**

- B. Defendant
- Madison County Jail
- is employed as

(a) (Name of First Defendant)

(b) (Position/Title)

with

(c) (Employer's Name and Address)

At the time the claim(s) alleged this complaint arose, was Defendant #1  
employed by the state, local, or federal government? ☐ Yes ☐ No

If your answer is YES, briefly explain:

**Defendant #2:**

C. Defendant \_\_\_\_\_ is employed as

(Name of Second Defendant)

\_\_\_\_\_  
(Position/Title)

with \_\_\_\_\_  
(Employer's Name and Address)

\_\_\_\_\_  
At the time the claim(s) alleged in this complaint arose, was Defendant #2  
employed by the state, local, or federal government? ☐ Yes ☐ No

If you answer is YES, briefly explain:

**Additional Defendant(s) (if any):**

D. Using the outline set forth above, identify any additional Defendant(s).

## II. PREVIOUS LAWSUITS

A. Have you begun any other lawsuits in state or federal court relating to your imprisonment? ☐ Yes ☒ No

B. If your answer to "A" is YES, describe each lawsuit in the space below. If there is more than one lawsuit, you must describe the additional lawsuits on another sheet of paper using the same outline. Failure to comply with this provision may result in summary denial of your complaint.

1. Parties to previous lawsuits:  
Plaintiff(s):

Defendant(s):

2. Court (if federal court, name of the district; if state court, name of the county):

3. Docket number:

4. Name of Judge to whom case was assigned:

5. Type of case (for example: Was it a habeas corpus or civil rights action?):

6. Disposition of case (for example: Was the case dismissed? Was it appealed? Is it still pending?):

7. Approximate date of filing lawsuit:

8. Approximate date of disposition:

### III. GRIEVANCE PROCEDURE

A. Is there a prisoner grievance procedure in the institution? ☐ Yes ☒ No

B. Did you present the facts relating to your complaint in the prisoner grievance procedure? ☐ Yes ☒ No

C. If your answer is YES,

1. What steps did you take?

2. What was the result?

D. If your answer is NO, explain why not.

There is no grievance package in this institution.

E. If there is no prisoner grievance procedure in the institution, did you complain to prison authorities? ☒ Yes ☐ No

F. If your answer is YES,

1. What steps did you take?

I was told that their short staffed

2. What was the result?

None

G. If your answer is NO, explain why not.

H. Attach copies of your request for an administrative remedy and any response you received. If you cannot do so, explain why not:

This institution does not provide copies of anything. This institution does not provide grievance forms of any fashion.

#### IV. STATEMENT OF CLAIM

- A. State here, as briefly as possible, when, where, how, and by whom you feel your constitutional rights were violated. Do not include legal arguments or citations. If you wish to present legal arguments or citations, file a separate memorandum of law. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. If your claims relate to prison disciplinary proceedings, attach copies of the disciplinary charges and any disciplinary hearing summary as exhibits. You should also attach any relevant, supporting documentation.

On July 3rd of 2014 around 2:30pm, during supper time I was taken to 7-South. Correctional Officer [redacted], whom was my cellmate at the time had swept and mopped our cell while I was in the shower. I finished showering and headed back to my cell, unaware that the floor in my cell was wet. As I went to enter my cell I slipped and fell. I buckled my head and was knocked out unconscious. I was rushed to Anderson Hospital in Maryville, IL. where I recieved five staples in the top right side of my head and suffered an concussion. In result of hitting my head against the steel bars I suffered the above injuries.

V. REQUEST FOR RELIEF

State exactly what you want this court to do for you. If you are a state or federal prisoner and seek relief which affects the fact or duration of your imprisonment (for example: illegal detention, restoration of good time, expungement of records, or parole), you must file your claim on a habeas corpus form, pursuant to 28 U.S.C. §§ 2241, 2254, or 2255. Copies of these forms are available from the clerk's office.

I would like compensation and or time reduction.

VI. JURY DEMAND (check one box below)

The plaintiff ☒ does ☐ does not request a trial by jury.

**DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11**

I certify to the best of my knowledge, information, and belief, that this complaint is in full compliance with Rule 11(a) and 11(b) of the Federal Rules of Civil Procedure. The undersigned also recognizes that failure to comply with Rule 11 may result in sanctions.

Signed on: 7-20-2014  
(date)

Trumel Freeman  
Signature of Plaintiff

6172 Laura Ave  
Street Address

Trumel Freeman  
Printed Name

ST. Louis Mo. 63136  
City, State, Zip

42718  
Prisoner Register Number

\_\_\_\_\_  
Signature of Attorney (if any)